

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-6563 (LJL)

**DECLARATION OF AARON E. NATHAN IN SUPPORT OF PLAINTIFFS' LETTER-  
MOTION TO COMPEL ANSWERS TO PLAINTIFFS' FIRST SET OF  
INTERROGATORIES**

I, Aaron E. Nathan, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs") in the above-captioned action.

2. I submit this declaration in support of Plaintiffs' Letter-Motion to Compel Defendant Rudolph W. Giuliani ("Defendant") to answer Interrogatories #4 and #8 from Plaintiffs' First Set of Interrogatories ("First Interrogatories"). A true and correct copy of the First Interrogatories are attached hereto as **Exhibit A**.

3. Plaintiffs served the First Interrogatories on Defendant on November 6, 2024. A true and correct copy of Plaintiffs' counsel's service on Defendant through his counsel is attached hereto as **Exhibit B**.

4. On November 22, 2024, Plaintiffs' counsel emailed Defendant's counsel stating that no response to the First Interrogatories had been received, and requesting a meet-and-confer. A true and correct copy of that correspondence is attached hereto as **Exhibit C**.

5. Counsel met and conferred that afternoon; following that meet-and-confer Plaintiffs' counsel agreed to an extension of time to November 26, 2024, at 2:00 p.m. Ex. C at 1. No responses were served by that deadline.

6. On Friday, November 29, 2024, during a meet-and-confer relating to the scheduling of Defendant's deposition, Defendant's counsel informed undersigned counsel that the interrogatory responses would be served that day. No responses were served that day.

7. On Monday, December 2, 2024, Defendant served his response to Plaintiffs' First Interrogatories. A true and correct copy of these responses was filed on December 5, 2024 as an exhibit to Plaintiffs' motion for sanctions, ECF No. 107-4, and is attached hereto as **Exhibit D**.

8. On December 3, 2024, Plaintiffs' counsel emailed Defendant's counsel, stating *inter alia* that Defendant's objections to Interrogatories #4 and #8 were waived because untimely, and were meritless, and requesting that Defendant supplement those answers accordingly by December 4, 2024. At Defendant's counsel's request, Plaintiffs' counsel agreed to extensions of that deadline, the last of which extended the deadline to 5:00 p.m. on December 8, 2024. A true and correct copy of that correspondence is attached hereto as **Exhibit E**.

9. On December 8, 2024, Mr. Giuliani served his amended responses to Plaintiffs' First Interrogatories. Defendant also included 17 "exhibits" with his Amended Responses which have been omitted here for space. A true and correct copy of Defendant's amended interrogatory responses, without exhibits, is attached hereto as **Exhibit F**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 13, 2024.

s/ Aaron E. Nathan  
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